Exhibit C

1 [Submitting counsel below] 2 3 UNITED STATES DISTRICT COURT 4 NORTHERN DISTRICT OF CALIFORNIA 5 SAN FRANCISCO DIVISION 6 7 No. 3:23-md-03084-CRB IN RE: UBER TECHNOLOGIES, INC., 8 PASSENGER SEXUAL ASSAULT LITIGATION **DECLARATION OF ROOPAL P. LUHANA** 9 IN SUPPORT OF PLAINTIFFS' POSITION FOR THE PARTIES' JOINT DISCOVERY 10 **LETTER** 11 Judge: Honorable Lisa J. Cisneros This Document Relates to: Date: TBD 12 All Cases Time: TBD Courtroom: TBD 13 14 15 I, Roopal P. Luhana, declare and state as follows: 16 I am an attorney and partner at Chaffin Luhana LLP, counsel for Plaintiffs and 1. 17 Court-appointed Co-Lead Counsel in this action. I am a member in good standing of the State 18 Bars of New York, New Jersey, Pennsylvania, and Connecticut and am admitted pro hac vice in 19 this coordinated action. I make this declaration based on my own personal knowledge. If called 20 upon to testify, I could and would testify competently to the truth of the matters stated herein. 21 2. I submit this Declaration in support of Plaintiffs' Position for the Parties Joint 22 Discovery Letter as required by this Court under Pretrial Order ("PTO") No. 8 (ECF No. 323). 23 3. The parties met and conferred as required by PTO No. 9 (ECF No. 345) on March 24 27, 2024 and April 2, 2024 to discuss potential solutions to the remaining ESI disputes. 25 4. I was involved in the meet and confers on March 27, 2024 and April 2, 2024. 26 5. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of 27 Douglas Forrest in Support of Plaintiffs' Position for the Parties Joint Discovery Letter. 28

	Case 3:23-md-03084-CRB Document 499-3 Filed 04/12/24 Page 3 of 3 Exhibit C
1	6. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Proposal and
2	Methodology for Contemporaneous Hyperlinked Documents.
3	7. Attached hereto as Exhibit G is a true and correct copy of email correspondence
4	between the parties dating March 21, 2024 through March 25, 2024.
5	8. Attached hereto as Exhibit H is a true and correct copy of a list of 23 questions
6	send to Defendants by Plaintiffs on March 21, 2024.
7	9. Attached hereto as Exhibit I is a true and correct copy of email correspondence
8	between the parties dating March 29, 2024 through April 11, 2024.
9	
10	I declare under penalty of perjury that the foregoing is true and correct. Executed on April
11	12, 2024, in San Francisco, California.
12	
13	<u>/s/ Roopal P. Luhana</u> Roopal P. Luhana
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